

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Deangelo Henderson

Case: 2:22-mj-30298
Case No. Assigned To : Unassigned
Assign. Date : 7/7/2022
USA V. HENDERSON (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 27, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm


This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 7, 2022

City and state: Detroit, Michigan


Complainant's signature

Special Agent Victor A. Mota, A.T.F.
Printed name and title


Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Special Agent Victor A. Mota, being sworn, depose and state the following:

I. INTRODUCTION

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been so employed since March 2020. I am currently assigned to the Detroit Field Division, group VII. I am tasked with investigating violations of firearms and narcotics laws.

2. During my employment with ATF, I have participated in criminal investigations focused on firearms, armed drug trafficking violations, and criminal street gangs. Through these investigations, my training and experience, and conversations with other agents and law enforcement personnel, I have become familiar with firearms violations.

3. I make this affidavit from personal knowledge based on my participation in this investigation, with exception of the matters expressly stated, which are based on information received from other law enforcement officials and/or their reports and records.

4. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation.

5. I am currently investigating Dangelo HENDERSON (XX/XX/1994) for possession of a firearm by a convicted felon, in violation of 18 U.S.C. § 922(g)(1).

II. SUMMARY OF THE INVESTIGATION

6. On October 27, 2021, Officers with the Detroit Police Department (DPD) were conducting surveillance on HENDERSON on Littlefield St., Detroit, MI. Officers had probable cause to arrest HENDERSON for a homicide, DPD investigation number 2105300084, that occurred on May 30, 2021.

7. Officers observed HENDERSON exiting a residence on Littlefield St. HENDERSON walked to a 2017 Ford Fusion and entered the vehicle using the driver's side door. To stop HENDERSON, DPD officers drove up to the 2017 Ford Fusion and stepped out of their patrol vehicle. At that time, HENDERSON began driving south on Littlefield across the lawn to flee from the officers.

8. DPD officers followed HENDERSON in their patrol vehicle with their overhead emergency lights and sirens activated. HENDERSON did not stop. Other officers joined the pursuit. Instead of pulling over, HENDERSON lead officers from two different jurisdictions—Detroit and Dearborn—on a 13-minute vehicle pursuit. At times, HENDERSON reached speeds of over 100 miles per hour and, in a couple instances, drove the wrong way into on-going traffic. During the pursuit, HENDERSON lost control of his vehicle and ended up driving backwards. As he

attempted to correct his direction, an officer with the Dearborn Police Department struck HENDERSON'S vehicle in an unsuccessful attempt to disable it. HENDERSON continued fleeing from law enforcement officers until he was in a more desolate area of Detroit.

9. After a 13-minute vehicle pursuit, officers were able to employ maneuvers to disable HENDERSON's vehicle and it was stopped in a grassy area in Detroit. Numerous officers from Dearborn and Detroit surrounded HENDERSON'S vehicle and gave him verbal commands to roll down the window. Eventually, HENDERSON complied. Officers approached HENDERSON's vehicle and assisted HENDERSON out of the vehicle onto the ground. Meanwhile, to make sure there were no other occupants or dangers, another team of officers ran to the other doors of the vehicle, opened them, and checked inside, with negative results. HENDERSON was handcuffed and placed in a patrol vehicle.

10. Following the pursuit and HENDERSON's arrest, DPD officers towed HENDERSON's 2017 Ford Fusion. During a pre-tow inventory search of the vehicle, officers observed what appeared to be the pistol grip of a handgun on the passenger-side floorboard of the Ford Fusion. Officers recovered a Glock 27, .40 caliber bearing serial number BBMR649, with 17 rounds in an extended magazine and one round chambered (18 total rounds) from the front passenger floorboard of the 2017 Ford Fusion.

11. A Law Enforcement Information Network (LEIN) search of the recovered Glock 27, .40 caliber pistol bearing serial number BBMR649 came back as reported stolen on August 28, 2018.

12. A review of HENDERSON's computerized criminal history reveals the following felony convictions all in Michigan:

- a. 2011: Attempted Carrying a Concealed Weapon;
- b. 2014: Police Officer – Fleeing – Third Degree;
- c. 2015: Controlled Substance – Possession/Analogues.

13. In two of these cases, HENDERSON was sentenced to at least one year in prison.

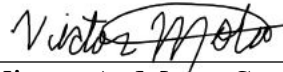
14. The above-mentioned convictions and sentences establish probable cause that HENDERSON knew, at the time he possessed the firearm, that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

15. An ATF Special Agent and Interstate Nexus Expert determined, based on a physical examination of the pistol, that the Glock 27, .40 caliber bearing serial number BBMR649 seized from HENDERSON is a “firearm” as defined under Chapter 44, Section 921, and was manufactured outside the State of Michigan after 1898, therefore, traveling in or affecting interstate commerce.

III. CONCLUSION

16. Probable cause exists that Dangelo HENDERSON, having been previously convicted of at least one crime punishable by imprisonment for a term exceeding one year and having knowledge of his prohibited status, did possess a firearm that had previously traveled in or affected interstate commerce in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Victor A. Mota, Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: July 7, 2022